

2018-0483

**THE STATE OF NEW HAMPSHIRE
JUDICIAL BRANCH**

<http://www.courts.state.nh.us>

RULE 7 NOTICE OF MANDATORY APPEAL

POSTED
ES.

This form should be used for an appeal from a final decision on the merits issued by a superior court or circuit court except for a decision from: (1) a post-conviction review proceeding; (2) a proceeding involving a collateral challenge to a conviction or sentence; (3) a sentence modification or suspension proceeding; (4) an imposition of sentence proceeding; (5) a parole revocation proceeding; (6) a probation revocation proceeding; (7) a landlord/tenant action or a possessory action filed under RSA chapter 540; (8) an order denying a motion to intervene; or (9) a domestic relations matter filed under RSA chapters 457 to 461-A other than an appeal from a final divorce decree or from a decree of legal separation. (An appeal from a final divorce decree or from a decree of legal separation should be filed on this form.)

1. COMPLETE CASE TITLE AND CASE NUMBERS IN TRIAL COURT

Christina DePamphilis v. Paul Maravelias
473-2016-CV-00124

2. COURT APPEALED FROM AND NAME OF JUDGE(S) WHO ISSUED DECISION(S)

10th Circuit Court - District Division - Derry
Hon. John J. Coughlin

3A. NAME AND MAILING ADDRESS OF APPEALING PARTY. IF REPRESENTING SELF, PROVIDE E-MAIL ADDRESS AND TELEPHONE NUMBER

Paul Maravelias
34 Mockingbird Hill Rd
Windham, NH 03087

E-Mail address: paul@paulmarv.com

Telephone number: (603) 475-3305

3B. NAME, FIRM NAME, MAILING ADDRESS, E-MAIL ADDRESS AND TELEPHONE NUMBER OF APPEALING PARTY'S COUNSEL

E-Mail address: _____

Telephone number: _____

4A. NAME AND MAILING ADDRESS OF OPPOSING PARTY. IF OPPOSING PARTY IS REPRESENTING SELF, PROVIDE E-MAIL ADDRESS AND TELEPHONE NUMBER

Christina DePamphilis

E-Mail address: _____

Telephone number: _____

4B. NAME, FIRM NAME, MAILING ADDRESS, E-MAIL ADDRESS AND TELEPHONE NUMBER OF OPPOSING PARTY'S COUNSEL

Simon R. Brown, Esq.
Preti, Flaherty, Beliveau & Pachios, LLP
P.O. Box 1318
Concord, NH 03302

E-Mail address: sbrown@preti.com

Telephone number: (603) 410-1500

Case Name: Christina DePamphilis v. Paul Maravelias**RULE 7 NOTICE OF MANDATORY APPEAL****5. NAMES OF ALL OTHER PARTIES AND COUNSEL IN TRIAL COURT**

6. DATE OF CLERK'S NOTICE OF DECISION OR SENTENCING. ATTACH COPY OF NOTICE AND DECISION.June 28th, 2018

DATE OF CLERK'S NOTICE OF DECISION ON POST-TRIAL MOTION, IF ANY. ATTACH COPY OF NOTICE AND DECISION.

August 7th, 2018 and August 13th, 2018**7. CRIMINAL CASES: DEFENDANT'S SENTENCE AND BAIL STATUS**

8. APPELLATE DEFENDER REQUESTED?☐ YES☒ NOIF YOUR ANSWER IS YES, YOU MUST CITE STATUTE OR OTHER LEGAL AUTHORITY UPON WHICH CRIMINAL LIABILITY WAS BASED AND ATTACH FINANCIAL AFFIDAVIT (OCC FORM 4)

9. IS ANY PART OF CASE CONFIDENTIAL?☐ YES☒ NOIF SO, IDENTIFY WHICH PART AND CITE AUTHORITY FOR CONFIDENTIALITY.
SEE SUPREME COURT RULE 12.

10. IF ANY PARTY IS A CORPORATION, LIST THE NAMES OF PARENTS, SUBSIDIARIES AND AFFILIATES.

11. DO YOU KNOW OF ANY REASON WHY ONE OR MORE OF THE SUPREME COURT JUSTICES WOULD BE DISQUALIFIED FROM THIS CASE?☐ YES☒ NO

IF YOUR ANSWER IS YES, YOU MUST FILE A MOTION FOR RECUSAL IN ACCORDANCE WITH SUPREME COURT RULE 21A.

12. IS A TRANSCRIPT OF TRIAL COURT PROCEEDINGS NECESSARY FOR THIS APPEAL?☒ YES☐ NOIF YOUR ANSWER IS YES, YOU MUST COMPLETE THE TRANSCRIPT ORDER FORM ON PAGE 4 OF THIS FORM.

Case Name: Christina DePamphilis v. Paul Maravelias


RULE 7 NOTICE OF MANDATORY APPEAL

13. LIST SPECIFIC QUESTIONS TO BE RAISED ON APPEAL, EXPRESSED IN TERMS AND CIRCUMSTANCES OF THE CASE, BUT WITHOUT UNNECESSARY DETAIL. STATE EACH QUESTION IN A SEPARATELY NUMBERED PARAGRAPH. SEE SUPREME COURT RULE 16(3)(b).

1. Is 633:3-a, III-c unconstitutionally overbroad or otherwise void for vagueness facially and/or as-applied to this case?
2. Was there sufficient evidence to support the trial court's finding that Christina DePamphilis had "reasonable fear" of the Defendant given her mid-order incitative harassment against him?
3. Did the trial court commit an unsustainable exercise of discretion and/or an error of law in granting the stalking order extension?
4. Has the same trial court judge presiding over this case and Mr. Maravelias's stalking petition against David DePamphilis (Hon. John J. Coughlin) carried out an unjust course of conduct on the brink of his retirement, marked by rampant prejudicial bias against Mr. Maravelias?
5. Did the trial court violate Defendant Maravelias's procedural due process rights?
6. Did the trial court violate *de novo* Defendant's rights afforded by substantive due process or by the specific advance notice requirement of 173-B:3, I, and/or wrongly re-commit similar violation(s) previously committed by the initial protective order by virtue of extending it?
7. Assuming 633:3-a, III-c is constitutional on its face, do acts of lawful, non-threatening speech constitute sufficient "good cause" concern for Plaintiff's "safety or well-being" to warrant stalking order extension?
8. Did Judge Coughlin commit a class B felony violation of RSA 641:5, I (B) in granting Plaintiff's 7/2/18 post-trial motion for expanded protective orders, forbidding Maravelias *inter alia* from even "possessing" her vulgar harassment social media posts against him, which are public legal exhibits necessary for his legal defense?
9. Did the trial court err in granting Plaintiff's 7/2/18 post-trial motion for addition of expanded protective orders?

14. CERTIFICATIONS

Paul J. Mure



Appealing Party or Counsel

Date _____

Case Name: Christina DePamphilis v. Paul Maravelias**RULE 7 NOTICE OF MANDATORY APPEAL****TRANSCRIPT ORDER FORM****INSTRUCTIONS:**

1. If a transcript is necessary for your appeal, you must complete this form.
2. List each portion of the proceedings that must be transcribed for appeal, e.g., entire trial (see Supreme Court Rule 15(3)), motion to suppress hearing, jury charge, etc., and provide information requested.
3. Determine the amount of deposit required for each portion of the proceedings and the total deposit required for all portions listed. Do not send the deposit to the Supreme Court. You will receive an order from the Supreme Court notifying you of the deadline for paying the deposit amount to the court transcriber. Failure to pay the deposit by the deadline may result in the dismissal of your appeal.
4. The transcriber will produce a digitally-signed electronic version of the transcript for the Supreme Court, which will be the official record of the transcribed proceedings. Parties will be provided with an electronic copy of the transcript in PDF-A format. A paper copy of the transcript will also be prepared for the court.

PROCEEDINGS TO BE TRANSCRIBED					
PROCEEDING DATE (List each day separately, e.g. 5/1/11; 5/2/11; 6/30/11)	TYPE OF PROCEEDING (Motion hearing, opening statement, trial day 2, etc.)	NAME OF JUDGE	LENGTH OF PROCEEDING (in .5 hour segments, e.g., 1.5 hours, 8 hours)	RATE (standard rate unless ordered by Supreme Court)	DEPOSIT
5/3/18	DV/Stalking PO Extension Hearing	Coughlin, J.	1.5 hrs.	X \$137.50	\$206.25
5/4/18	DV/Stalking PO Extension Hearing	Coughlin, J.	2.5 hrs.	X \$137.50	\$343.75
6/8/18	DV/Stalking PO Extension Hearing	Coughlin, J.	2.5 hrs.	X \$137.50	\$343.75
				TOTAL DEPOSIT	\$893.75

PROCEEDINGS PREVIOUSLY TRANSCRIBED					
PROCEEDING DATE (List date of each transcript volume)	TYPE OF PROCEEDING (Motion hearing, opening statement, trial day 2, etc.)	NAME OF JUDGE	NAME OF TRANSCRIBER	DO ALL PARTIES HAVE COPY (YES OR NO)	DEPOSIT FOR ADDITIONAL COPIES
1/5/2017	DV/Stalking Final Hearing	Stephen, R.	Sheri Chism (AVTranz)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	TBD
1/12/2017	DV/Stalking Final Hearing	Stephen, R.	Brittany Donnell and Nancy Dewitz (AVTranz)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	TBD
2/1/2017	DV/Stalking Final Hearing	Stephen, R.	Nancy Dewitz and Susan Leong (AVTranz)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	TBD

NOTE: The deposit is an estimate of the transcript cost. After the transcript has been completed, you will be required to pay an additional amount if the final cost of the transcript exceeds the deposit. Any amount paid as a deposit in excess of the final cost will be refunded. The transcript will not be released to the parties until the final cost of the transcript is paid in full.

Case Name: Christina DePamphilis v. Paul Maravelias

RULE 7 NOTICE OF MANDATORY APPEAL

Enclosed hereinafter (p. 7 – 20) pursuant to Supreme Court Rule 7(6)(A):

1. 6/28/18 NOTICE OF DECISION AND FINDINGS OF FACT ON MOTION TO EXTEND STALKING ORDER AND ORDER ON DEFENDANT'S MOTION FOR DISCOVERY
 - a. CLERK'S 6/28/18 NOTICE OF DECISION – P. 7
 - b. 6/15/18 ORDER ON STALKING ORDER EXTENSION – P. 8
 - c. FINDING OF FACTS IN 6/15/18 ORDER ON STALKING ORDER EXTENSION – P. 9
 - d. 6/12/18 DENIAL ORDER ON DEFENDANT'S MOTION FOR DISCOVERY – P. 10
2. 8/7/18 CLERK'S NOTICE AND ORDER ON DEFENDANT'S MOTION FOR RECONSIDERATION AND ORDER ON DEFENDANT'S MOTION TO STRIKE
 - a. CLERK'S 8/7/18 NOTICE – P. 11
 - b. 7/13/18 DENIAL ORDER OF DEFENDANT'S MOTION FOR RECONSIDERATION – P. 12
 - c. 7/13/18 DENIAL ORDER OF DEFENDANT'S MOTION TO STRIKE – P. 13
3. 8/13/18 CLERK'S NOTICE AND ORDERS ON PLAINTIFF'S MOTION FOR MODIFICATION OF STALKING FINAL ORDER OF PROTECTION TO INCLUDE FURTHER TERMS AND RELATED PLEADINGS; DENIAL ORDER OF DEFENDANT'S REPLY TO PLAINTIFF'S OBJECTION TO DEFENDANT'S MOTION FOR RECONSIDERATION
 - a. CLERK'S 8/13/18 NOTICE – P. 14
 - b. 8/7/18 DENIAL ORDER OF DEFENDANT'S REPLY TO PLAINTIFF'S REPLY TO DEFENDANT'S OBJECTION TO PLAINTIFF'S MOTION FOR MODIFICATION OF STALKING FINAL ORDER OF PROTECTION – P. 15
 - c. 7/13/18 ORDER ON PLAINTIFF'S REPLY TO DEFENDANT'S MOTION TO STRIKE – P. 16
 - d. 8/7/18 ORDER ON PLAINTIFF'S REPLY TO DEFENDANT'S OBJECTION TO PLAINTIFF'S MOTION FOR MODIFICATION OF STALKING FINAL ORDER OF PROTECTION – P. 17
 - e. 7/13/18 DENIAL ORDER OF DEFENDANT'S OBJECTION TO PLAINTIFF'S MOTION FOR MODIFICATION OF STALKING FINAL ORDER OF PROTECTION – P. 18
 - f. 7/13/18 DENIAL ORDER OF DEFENDANT'S REPLY TO PLAINTIFF'S OBJECTION TO DEFENDANT'S MOTION FOR RECONSIDERATION – P. 19
 - g. 8/7/18 ORDER GRANTING PLAINTIFF'S MOTION FOR MODIFICATION OF STALKING FINAL ORDER OF PROTECTION – P. 20

Case Name: Christina DePamphilis v. Paul Maravelias

RULE 7 NOTICE OF MANDATORY APPEAL

**THE STATE OF NEW HAMPSHIRE
JUDICIAL BRANCH
NH CIRCUIT COURT**

10th Circuit - District Division - Derry
10 Courthouse Lane
Derry NH 03038

Telephone: 1-855-212-1234
TTY/TDD Relay: (800) 735-2964
<http://www.courts.state.nh.us>

DV/STALKING NOTICE OF DECISION

**PAUL MARAVELIAS
34 MOCKINGBIRD HILL RD
WINDHAM NH 03087**

Case Name: **Christina DePamphilis v. Paul Maravelias**
Case Number: **473-2016-CV-00124**

PNO: 4731620124

Please be advised that on June 28, 2018 Hon John J. Coughlin made the following order relative to:

- ☐ Petition ☐ Final Order ☒ Other Amended Extension of DV Protective Order and Motion for Discovery order issued 6/12/18
- ☐ Notice of Interstate Enforcement and Compliance with VAWA for Use with Final Order

June 28, 2018


Robin E. Pinelle, Clerk of Court

()

C: Simon Robert Brown, ESQ; Police Department

NHJB-2400-DF (07/01/2011)

Case Name: Christina DePamphilis v. Paul Maravelias**RULE 7 NOTICE OF MANDATORY APPEAL**

**THE STATE OF NEW HAMPSHIRE
JUDICIAL BRANCH
NH CIRCUIT COURT**

10th Circuit - District Division - Derry
10 Courthouse Lane
Derry NH 03038

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**AMENDED
ORDER ON FURTHER EXTENSION OF
DOMESTIC VIOLENCE OR STALKING FINAL PROTECTIVE ORDER**
Pursuant to RSA 633:3-a or 173-B

Case Number: **473-2016-CV-00124** PNO: **4731620124**
Christina DePamphilis 12/12/2000 V. Paul Maravelias 05/24/1995
 Plaintiff Pif Date of Birth Defendant Def Date of Birth

Pursuant to the provision of New Hampshire RSA 173-B:5, VI or RSA 633:3-a, III-c, the Plaintiff requests a further extension of the Final Protective Order issued on February 07, 2017, the Plaintiff having been originally granted a one-year extension.

- ☒ The Court finds, based upon the Plaintiff's representations, that good cause exists to extend the order. Accordingly, the Final Protective Order is hereby further extended to 2/15/19. The Defendant shall be given notice of Plaintiff's request and this order. If the Defendant objects to the extension, he/she shall file a written objection within 10 days of the date of the Clerk's Notice of Decision and a hearing shall be conducted within 30 days of this order. At such hearing, the Court may either reaffirm, modify or vacate this extension order. If a hearing is scheduled, both parties shall appear. *The Court completed a contested hearing on the merits.*
- ☐ The Court finds, based upon the Plaintiff's representations, that good cause does not exist and the request to extend the order is denied.

Recommended:

Date _____

Signature of Marital Master _____

Printed Name of Marital Master _____

So Ordered:

I hereby certify that I have read the recommendation(s) and agree that, to the extent the marital master/judicial referee/hearing officer has made factual findings, she/he has applied the correct legal standard to the facts determined by the marital master/judicial referee/hearing officer.

Date 6/15/18

Signature of Judge _____

John J. Coughlin

Printed Name of Judge _____

NHJB-2100-DFS (07/01/2011)

Case Name: Christina DePamphilis v. Paul Maravelias

RULE 7 NOTICE OF MANDATORY APPEAL

06/21/2018 14:47

#706 P.002/002

THE STATE OF NEW HAMPSHIRE
JUDICIAL BRANCH
<http://www.courts.state.nh.us>

Court Name: 10th Circuit court – District Division – Derry

Case Number: 473-2016-CV-124

Case Name: Christina DePamphilis v. Paul Maravelias

ORDER

On 5/3/18, 5/4/18, and 6/8/18 the Court held a hearing on the Petitioner's Motion to Extend Duration of Stalking Final Order of Protection and the Petitioner's Objection thereto. Both parties were present, sworn and testified. Upon consideration of the testimony and numerous exhibits, the Court finds that the Petitioner sustained her burden of proof by a preponderance of the evidence for "good cause". Further, the Court finds that the Petitioner composed or aided in the composition of letters to the Petitioner's family (Petitioner's Exhibit 1); to Attorney Brown (Petitioner's Exhibit 2); email to Petitioner's school (Petitioner's Exhibit 3). Also, the Petitioner collected coke bottles with the Petitioner's name and kept them in his room (Petitioner's Exhibits 5 and 6) and had duplicated inspirational phrases on the wall of the Petitioner's bedroom in his own bedroom (Petitioner's Exhibits 7 and 8). That such letters, emails, coke bottles, and duplicate inspirational phrases clearly demonstrate a strange, perverse and unhealthy obsession by the Petitioner towards the Petitioner which appears to have begun when the Petitioner was approximately 11-12 years old and the Petitioner was approximately 17-18 years old and continues to this day. Further, the Petitioner's behavior is without any legitimate purpose and for the sole purpose of harassing and stalking the Petitioner. Further, the Petitioner has a reasonable basis to fear for her personal safety and that of her family members and does, in fact, so fear for her personal safety and that of her family members.

Therefore, pursuant to NH RSA 633:3-a III-c the Court grants the Petitioner's Motion to Extend Duration of Stalking Final Order of Protection until 2/5/19.

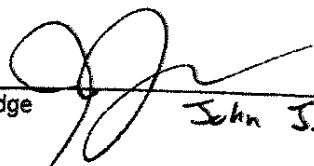
The Court denies the Petitioner's objection thereto.

So Ordered:

Date

6/15/18

Judge


John J. Coughlin

Case Name: Christina DePamphilis v. Paul Maravelias**RULE 7 NOTICE OF MANDATORY APPEAL**

THE STATE OF NEW HAMPSHIRE
JUDICIAL BRANCH
<http://www.courts.state.nh.us>

Court Name: 10th Circuit - District Division - Derry
Case Name: Christina DePamphilis v. Paul Maravelias
Case Number: 473-2016-CV-00124
(if known)

MOTION: MOTION FOR DISCOVERY

I, Paul Maravelias,
state the following facts and request the following relief:
See attached.

2019 MAY 29 A 10:56
RECEIVED
CLERK OF COURT

5/29/18
Date
603-425-7365
Telephone

[Signature]
Signature
39 MACK PLACE, BETHLEHEM, NH 03801
Address

I certify that on this date I provided a copy of this document to SIMON A. BROWN, ESQ. (other party) or to
(other party's attorney) by: ☐ Hand-delivery OR ☒ US Mail OR
☐ E-mail (E-mail only by prior agreement of the parties based on Circuit Court Administrative Order).

5/29/18
Date

[Signature]
Signature

ORDER☐ Motion granted.☒ Motion denied.Motion denied on 6/6/18 SK

Recommended:

Date

Signature of Marital Master/Referee

Printed Name of Marital Master/Referee

So Ordered:

I hereby certify that I have read the recommendation(s) and agree that, to the extent the marital master/judicial referee/hearing officer has made factual findings, she/he has applied the correct legal standard to the facts determined by the marital master/judicial referee/hearing officer.

Date 6/12/18

Signature of Judge

Printed Name of Judge

Case Name: Christina DePamphilis v. Paul Maravelias

RULE 7 NOTICE OF MANDATORY APPEAL

**THE STATE OF NEW HAMPSHIRE
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DV/STALKING NOTICE OF DECISION

**PAUL MARAVELIAS
34 MOCKINGBIRD HILL RD
WINDHAM NH 03087**

Case Name: **Christina DePamphilis v. Paul Maravelias**
Case Number: **473-2016-CV-00124**

PNO: 4731620124

Please be advised that on July 13, 2018 Hon John J. Coughlin made the following order relative to:

- ☐ Petition ☐ Final Order ☒ Other Motion to Strike : Motion for Reconsideration
- ☐ Notice of Interstate Enforcement
and Compliance with VAWA for
Use with Final Order

August 07, 2018



Robin E. Pinelle, Clerk of Court

()

C: Simon Robert Brown, ESQ; Police Department

Case Name: Christina DePamphilis v. Paul MaraveliasRULE 7 NOTICE OF MANDATORY APPEAL

48. This Court attempts to obfuscate such behaviors by acting in a fair, impartial, and permissive fashion during public hearings to admit all sorts of evidence it later categorically discards when making findings, pretending such evidence never existed and neglecting its duty to rule on key Motions.
49. Seen in conjunction with the baseless defamatory comments of fine-tuned verbal posturing in this Order, clear signs of systematic judicial corruption are noted. This Court, an office whose duty is the impartial arbitration of justice, has cowardly prostrated itself before the authoritarian altar of false victim advocacy and feminist incapacity to favor a male *pro se* Respondent against a younger lawyer-represented female Petitioner, even with a mountain of irrefutable facts and laws so necessitating.

WHEREFORE, the foregoing compels the Respondent to pray this Court:

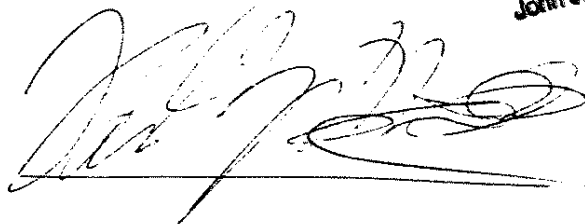
- I. Grant this Motion;
- II. Reverse its 6/15/18 Order granting Petitioner's Motion to Extend Stalking Order;
- III. Painstakingly review legal theory and case law in this area to appreciate the severity of infringement against Respondent's free speech rights which said Order does impose until corrected, with the suggested literature^{4,5,6}, to prevent further unconstitutional errors; and
- IV. Issue an Order of declaratory relief apologizing to Mr. Maravelias for the baseless defamatory comments against him in this Court's 6/15/18 Order and recanting the same.

Signed and submitted,

PAUL J. MARAVELIAS,
in propria persona

June 25th, 2018

7/13/18
Doneal
John J. Doneal



⁴ Volokh, Eugene. "One-to-One Speech vs. One-to-Many Speech, Criminal Harassment Laws, and Cyberstalking." *Nw. UL Rev.* 107 (2012): 731.

⁵ Buchhandler-Raphael, Michal. "Overcriminalizing Speech." *Cardozo L. Rev.* 36 (2014): 1667.

⁶ Volokh, Eugene. "The Freedom of Speech and Bad Purposes." *UCLA L. Rev.* 63 (2016): 1366.

Case Name: Christina DePamphilis v. Paul Maravelias

RULE 7 NOTICE OF MANDATORY APPEAL

20. This is not a legal argument; it is false assumption of fact non-existent in the record.

Thus, it should be stricken.

WHEREFORE, the foregoing compels the Respondent, Paul Maravelias, to pray this

Honorable Court:

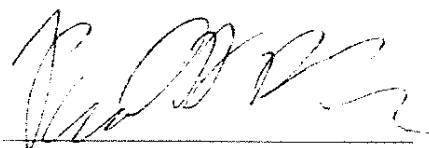
- I. Grant this Motion;
- II. Strike Paragraph 11 of Petitioner's *Objection to Respondent's Motion for Reconsideration* from the Court's record; and
- III. Grant such other relief as may be just and proper.

Respectfully submitted,

PAUL J. MARAVELIAS,

in propria persona

July 5th, 2018



7/13/18
Denied
JJ
John J. Coughlin

Case Name: Christina DePamphilis v. Paul Maravelias

RULE 7 NOTICE OF MANDATORY APPEAL

**THE STATE OF NEW HAMPSHIRE
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DV/STALKING NOTICE OF DECISION

**PAUL MARAVELIAS
34 MOCKINGBIRD HILL RD
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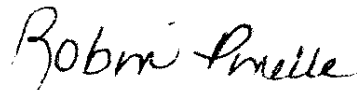
Case Name: **Christina DePamphilis v. Paul Maravelias**
Case Number: **473-2016-CV-00124**

PNO: 4731620124

Please be advised that on August 07, 2018 Hon John J. Coughlin made the following order relative to:

- *Index # 44* Reply to Petitioner's Reply to Respondent's Objection to Petitioner's Motion for Modification of Stalking Final Order of Protection; "The Court takes no action as the Court granted the Petitioner's Motion on 8/7/18."
- *Index # 43* Petitioner's Objection to Respondent's Motion to Strike; "On 7/13/18 the Court Denied the Respondent's Motion to Strike."
- *Index # 42* Petitioner's Reply to Respondent's Objection to Motion for Modification of Stalking Final Order of Protection to Include Further Conditions; "The Court granted the Petitioner's Motion for Modification on Stalking Final Order of Protection on 8/7/18."
- *Index #40* Respondent's Objection to Petitioner's Motion for Modification of Stalking Final Order of Protection to Include Further Conditions; "Respondent's objection is denied."
- *Index #39* Reply to Petitioner's Objection to Respondent's Motion for Reconsideration; "Respondent's Reply to Petitioner's Objection to Respondent's Motion for Reconsideration is denied." **Order Issued on 7/13/18**
- *Index #38* Petitioner's Motion for Modification of Stalking Final Order of Protection to Include Further Conditions; "Granted as to Petitioner's request for relief A, B1, B2 and B3."

August 13, 2018



Robin E. Pinelle, Clerk of Court

()

C: Simon Robert Brown, ESQ; Police Department

NHJB-2400-DF (07/01/2011)

Case Name: Christina DePamphilis v. Paul Maravelias

RULE 7 NOTICE OF MANDATORY APPEAL

IDENTIFICATION PROFILE OF PERPETRATOR

DePamphilis, Christina (D.O.B. 12/12/00)

Residence:

(Summertime) 129 Cable Ave, Salisbury, MA, 01952
(Permanent) 10 Cardiff Rd, Windham, NH 03087

EVIDENTIARY APPENDIX

See enclosed USB drive.

Official transcripts for January/February 2017 original stalking hearings in "Transcripts" folder.


Formal transcripts of the 5/3/18, 5/4/18, and 6/8/18 hearings from this year in Derry for the stalking order extension case have not yet been ordered. However, most of the extension hearing was videotaped and uploaded to YouTube at the following links.

In order to quickly search for phrases and key parts, use the "Open Transcript" feature on the YouTube player and then use your browser's search function. It is a low-quality machine-generated transcript, but very useful for navigation.

5/3/18 and 5/4/18 (cross-examination of Christina DePamphilis):
<https://www.youtube.com/watch?v=ErlfhybLE3w>

5/4/18 and 6/8/18 (Maravelias testimony):
<https://www.youtube.com/watch?v=eAluzOJQWLY>

These links are repeated in USB text file.

9/7/18 The Court takes no
Action as the Court
granted the Petitioner's
motion on 9/7/18

John J. Coughlin

Case Name: Christina DePamphilis v. Paul Maravelias

RULE 7 NOTICE OF MANDATORY APPEAL

and the Petitionee was approximately 17-18 years old *and continues to this day.*" (emphasis added) *See Exhibit A* (Court's 6/15/2018 Order granting Motion to Extend).

WHEREFORE, for the reasons set forth above, Petitioner respectfully requests this Honorable Court to:

- A. Deny Respondent's Motion to Strike; and
- B. Grant such other relief as may be just and proper.


Respectfully submitted,

CHRISTINA DePAMPHILIS

By her attorneys,

PRETI, FLAHERTY, BELIVEAU &
PACHIOS, PLLP

Dated: July 12, 2018

By: 
Simon R. Brown, NH Bar #9279
P.O. Box 1318
Concord, NH 03302-1318
(603) 410-1500

CERTIFICATE OF SERVICE

I hereby certify this 12th day of July 2018 a copy of the foregoing *Petitioner's Objection to Respondent's Motion to Strike* has been forwarded via U.S. First Class Mail, postage pre-paid, to Respondent, Paul Maravelias, *pro se*.

On 7/13/18 
Simon R. Brown

The Court
Denied the Respondent's
Motion to Strike

2

07/18 
William J. Coughlin 3208216 1

Case Name: Christina DePamphilis v. Paul Maravelias

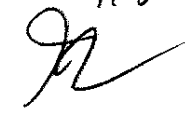
RULE 7 NOTICE OF MANDATORY APPEAL

CERTIFICATE OF SERVICE

I hereby certify this 12th day of July 2018 a copy of the foregoing *Petitioner's Reply to Respondent's Objection to Motion for Modification of Stalking Final Order of Protection to Include Further Conditions* has been forwarded via U.S. First Class Mail, postage pre-paid, to Respondent, Paul Maravelias, *pro se*.


Simon R. Brown

8/7/18 The Court
granted the
The Petitioner's
Motion for Modification
of Stalking Final
Order of Protection
on 8/7/18


John J. Coughlin

Case Name: Christina DePamphilis v. Paul Maravelias

RULE 7 NOTICE OF MANDATORY APPEAL

55. To echo familiar language from yesterday's national holiday, in every stage of this Court's oppressions, Mr. Maravelias has petitioned for redress in the most humble terms. His repeated petitions have been answered only by repeated injury. A Court whose character is thus marked by every act which may define a tyrant, is unfit to be the judiciary of a free people.

WHEREFORE, the foregoing compels the Respondent, Paul Maravelias, to pray this Court:

- I. Grant this Motion;
- II. Grant Respondent's 6/25/18 *Motion for Reconsideration*, which will terminate the Stalking Order and dismiss Petitioner's instant Motion as well as this Objection thereto,
- III. Deny Petitioner's *Motion for Modification of Stalking Final Order of Protection to Include Further Conditions*; and
- IV. Hold a Hearing, if necessary, on this matter.

Respectfully submitted,

PAUL J. MARAVELIAS,

in propria persona

July 5th, 2018

*7/3/18
Respondent's Objection
is Denied.*

John J. Coughlin



Case Name: Christina DePamphilis v. Paul Maravelias

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WHEREFORE, the foregoing compels the Respondent, Paul Maravelias, to pray this Honorable Court:

- I. Grant this Motion;
- II. Grant Respondent's 6/25/18 Motion for Reconsideration; and
- III. Grant such other relief as may be just and proper.

Respectfully submitted,

PAUL J. MARAVELIAS,

in propria persona



July 5th, 2018

7/13/18 Respondent's
Reply to Petitioner's
Objection to Respondent's
Motion for Reconsideration
is Denied

John J. Coughlin


Case Name: Christina DePamphilis v. Paul Maravelias

RULE 7 NOTICE OF MANDATORY APPEAL

CERTIFICATE OF SERVICE

I hereby certify this 2nd day of July 2018 a copy of the foregoing Petitioner's *Motion for Modification of Stalking Final Order of Protection to Include Further Conditions* has been forwarded via U.S. First Class Mail, postage pre-paid, to Respondent, Paul Maravelias, *pro se*.


Simon R. Brown

8/7/18
Granted as to
Petitioner's Request for Relief
A.; B1; B2; B3 
John J. Coughlin